

# EXHIBIT A

**This exhibit contains all of the time records for each attorney for whom Plaintiff seeks fees. For easy reference, the totals are as follows:**

Community Lawyers Group (Wood and Chatman): \$41,389.00 in fees, \$625.55 in expenses

Amy Clark: \$8,720 in fees, no expenses

Robert Zimmer: \$10,432.50 in fees, no expenses

Daniel Brown: \$45,560 in fees, \$851.49 in expenses

Community Lawyers, LLC.

## Time and Expenses For: Jones v. Portfolio Recovery Associates, LLC. et al 16-cv-00572

<u>Date</u>	<u>Person</u>	<u>Task/Activity Description</u>	<u>Time</u>	<u>Hour</u>	<u>Total</u>
5/10/16	MW	File intake, being dunned on a credit card account by PRA. Referral, account not accurate.	1.30	\$372.00	\$483.60
5/13/16	MW	Draft complaint, compare to atty notes, updates to timeline. File in ECF.	3.00	\$372.00	\$1,116.00
5/13/16	MW	Case assigned to Judge Pitman read, review and note standing order,	0.20	\$372.00	\$74.40
6/10/16	CC	Read, review and note Defendant's PRA Answer and Affirmative Defenses. Prepare notes for motion to strike.	1.20	\$335.00	\$402.00
6/10/16	CC	Read, review and note Defendant's Western Surety Company Answer and Affirmative Defenses. Prepare notes for motion to strike.	1.20	\$335.00	\$402.00
6/11/16	CC	Read and Review Defendant's Certificate of Interested Parties	0.10	\$335.00	\$33.50
6/13/16	CC	Edit and File Defendant's Proposed Schedule Order	1.00	\$335.00	\$335.00
8/11/16	CC	Note status hearing is schedule for 8/23/2016	0.10	\$335.00	\$33.50
8/23/16	CC	Note and calendar dates in scheduling order	0.20	\$335.00	\$67.00
8/29/16	CC	Receive email from OC regarding scheduling Plaintiff's deposition	0.10	\$335.00	\$33.50
9/1/16	CC	Receive and Respond to OC email regarding Plaintiff's deposition	0.10	\$335.00	\$33.50
9/5/16	CC	Draft Plaintiff's Rule 26(a)(1) Disclosures	1.00	\$335.00	\$335.00
9/5/16	CC	Draft Plaintiff's Request To Admit	1.20	\$335.00	\$402.00
9/6/16	CC	Draft Plaintiff's Request For Production of Documents	2.30	\$335.00	\$770.50
9/6/16	CC	Draft Plaintiff's Interrogatories	2.20	\$335.00	\$737.00
9/6/16	MW	Review & Finalize Plaintiff's First Set of Discovery Request to Defendant	1.40	\$372.00	\$520.80
10/4/16	CC	Email OC settlement demand along with a draft settlement agreement	0.40	\$335.00	\$134.00
10/6/16	MW	Receive & Respond to OC email regarding discovery extension	0.10	\$372.00	\$37.20
10/6/16	MW	T/C with co-counsel Tyler Hickle regarding deposition of Jean Jones	0.30	\$372.00	\$111.60
	CC		0.30	\$335.00	\$100.50
10/24/16	CC	Receive & Review Defendant's Responses To Plaintiff's First Set of Discovery Request, notate deficiencies for motion to compel	3.00	\$335.00	\$1,005.00
11/15/16	CC	Draft and File ADR Report	1.00	\$335.00	\$335.00

11/28/16	CC	Receive & Review Defendant's Supplemental Answers to Plaintiff's Reqeust For Production of Documents	2.30	\$335.00	\$770.50
1/5/17	MW	Read, Review, & Note Defendant's Motion For Summary Judgment, (i.e. see if we can respond)	2.00	\$372.00	\$744.00
1/9/17	CC	Receive & Respond to email from co-counsel RZ regarding Defendant's motion for summary judgment	0.20	\$335.00	\$67.00
1/19/17	CC	Draft & File Plaintiff's Motion To Defer Consideration of Defendant's Motion For Summary Judgment	2.30	\$335.00	\$770.50
2/18/17	MW	T/C with co-counsel regarding motion for summary judgment	0.30	\$372.00	\$111.60
	CC		0.30	\$335.00	\$100.50
2/20/17	CC	Read & Edit Plaintiff's Motion For Summary Judgment	1.30	\$335.00	\$435.50
2/20/17	CC	Read & Edit Plaintiff's Response to Defendant's Motion For Summary Judgment	1.40	\$335.00	\$469.00
2/28/17	CC	Read, Review & Take Note on Defendant's Reply to Defendant's Motion For Summary Judgment (i.e. see if sur-reply is needed	1.20	\$335.00	\$402.00
3/7/17	CC	Read, Review & Take Note on Defendant's Response to Plaintiff's Motion For Summary Judgment	1.20	\$335.00	\$402.00
3/13/17	CC	Draft & Edit Plaintiff's Reply to Plaintiff's Motion For Summary Judgment	1.40	\$335.00	\$469.00
3/17/17	CC	Receive and Respnd to OC email regarding Defendant's motion to strike Plaintiff's Reply to Plaintiff's Motion For Summary Judgment	0.20	\$335.00	\$67.00
3/28/17	CC	Read & Review & Take Note on Defendant's Motion To Strke Exhibits to Plaintiff's Reply to Plaintiff's Motion For Summary Judgment	1.00	\$335.00	\$335.00
3/28/17	CC	Read & Review & Take Note on Defendant's Motion For Leav to File Sur-reply	1.00	\$335.00	\$335.00
5/18/17	CC	Receive & Respond to email from co-counsel regarding withdrawing drawing from case and	0.30	\$335.00	\$100.50
7/10/17	CC	Draft & File Plaintiff's Motion For Leave To File Supplemental Authority	1.40	\$335.00	\$469.00
7/17/17	CC	Read, Review & Take Note on Defendant's Response to Plaintiff's Motion For Leave to File Supplemental Authority	0.40	\$335.00	\$134.00
8/14/17	CC	Draft & File Plaintiff's Motion For Extension of Time To File Pre-Trial Material	1.30	\$335.00	\$435.50

8/15/17	CC	Read, Review & Take Note on Defendant's Response to Plaintiff's Motion For Extension of Time to File Pre-Trial Material	0.30	\$335.00	\$100.50
8/15/17	CC	Read Order granting in part and denying in part Plaintiff's Motion For Extension of Time	0.10	\$335.00	\$33.50
8/15/17	CC	Calendar trial date schedule for 8/29/2017	0.10	\$335.00	\$33.50
8/15/17	MW	Read, Review & Take Note on Proposed Jury Instructions by PRA	2.30	\$372.00	\$855.60
8/15/17	MW	Read, Review, & Take Note on Defendant's List of Defenses For Voire Dire	0.20	\$372.00	\$74.40
8/15/17	MW	Read, Review & Take Note on Defendant's Exhibit's List	0.20	\$372.00	\$74.40
8/15/17	MW	Read, & Review Defendant's Notice of Estimation of Trial Length	0.20	\$372.00	\$74.40
8/15/17	MW	Read, Review, & Take Note on Defendant's Motion In Limine	2.30	\$372.00	\$855.60
8/16/17	MW	Read, Review & Take Note on Defendant's Proposed Voire Dire	1.00	\$372.00	\$372.00
8/16/17	MW	Read, Review & Take Note on Defendant's statement of disputed facts	0.40	\$372.00	\$148.80
8/16/17	MW	Read, Review & Take Note on Defendants Witness list	0.30	\$372.00	\$111.60
8/16/17	CC	Read & Review Court Memorandum & Opinion granting in part and denying in part Plaintiff's Motion For Summary Judgment	0.40	\$335.00	\$134.00
8/16/17	CC	Draft Plaintiff's Proposed Jury Instructions	3.50	\$335.00	\$1,172.50
8/16/17	CC	Draft Plaintiff's Proposed Voire Dire Questions	2.00	\$335.00	\$670.00
8/16/17	CC	Draft Plaintiff's Proposed List of Claims For Judge's Voir Dire	1.30	\$335.00	\$435.50
8/16/17	CC	Draft and File Plaintiff's Proposed Estimation of Trial Length	0.30	\$335.00	\$100.50
8/17/17	MW	Edit Plaintiff's Proposed Jury Instructions	1.40	\$372.00	\$520.80
8/17/17	MW	Edit Plaintiff's Proposed Voire Dire Questions	1.00	\$372.00	\$372.00
8/17/17	CC	Draft & File Motion In Limine in Reference to Attorney Fees	1.30	\$335.00	\$435.50
8/17/17	CC	Draft & File Motion in Limine Regarding Underlying Debt	1.20	\$335.00	\$402.00
8/17/17	CC	Draft & File Motion in Limine Regarding Attorney Motives	1.30	\$335.00	\$435.50
8/17/17	CC	Draft & File Motion in Limine Regarding Admitted Matters	1.20	\$335.00	\$402.00
8/17/17	CC	Draft & File Motion in Limine Regarding Offers of Judgment	1.00	\$335.00	\$335.00
8/24/17	CC	Read & Review & Take Note on Defendant's Response/ Objection to Plaintiff's Identification & Statement of Witness	1.20	\$335.00	\$402.00
8/24/17	CC	Read, Review & Take Note on Defendant's Motion In Limine Regarding Attorney Fees	1.00	\$335.00	\$335.00
8/24/17	CC	Read, Review, & Take Note on Defendant's Objections to Plaintiff's Statement and Identification of Exhibits	1.20	\$335.00	\$402.00

8/28/17	MW	Strategy meeting with co-counsel regarding trial	1.30	\$372.00	\$483.60
	CC		1.30	\$335.00	\$435.50
9/26/17	CC	Read, Review & Take Note on Defendant's Motion For Judgment As Matter of Law	2.00	\$335.00	\$670.00
9/26/17	CC	Read, Review & Take Note on Defendant's Motion For New Trial	3.00	\$335.00	\$1,005.00
10/6/17	CC	Draft & File Plaintiff's Motion For Extension of Time To File Response to New Trial	1.00	\$335.00	\$335.00
10/6/17	CC	Draft & File Plaintiff's Motion For Extension of Time To File Response To Defendant's Renewed Motion For Judgment As A Matter of Law	1.30	\$335.00	\$435.50
10/13/17	MW	Review & Edit Plaintiff's Response To Defendant's Motion For New Trial	1.40	\$335.00	\$469.00
10/19/17	CC	Draft Plaintiff's Response to Defendant's Motion For Judgment As A Matter of Law	3.30	\$335.00	\$1,105.50
10/20/17	MW	Edit Plaintiff's Response to Defendant's Motion For Judgment As A Matter of Law	1.40	\$335.00	\$469.00
10/20/17	CC	Read, Review, & Edit Defendant's Reply to Defendant's Motion For New Trial	1.30	\$335.00	\$435.50
10/27/17	CC	Read, Review, & Note Defendant's Reply to Defendant's Renewed Motion for Judgment As A Matter of Law	1.00	\$335.00	\$335.00
7/27/18	CC	Read & Review Memorandum and Opinion Granting Motion For Judgment As A Matter of Law	1.30	\$335.00	\$435.50
8/24/18	MW	Draft and File Notice of Appeal	0.40	\$372.00	\$148.80
11/28/18	MW	Meeting with co-counsel DB regarding JMOL and case history	0.30	\$372.00	\$111.60
1/7/19	MW	Strategy meeting with co-counsel regarding appeal and answering	0.70	\$372.00	\$260.40
	CC	background questions	0.70	\$335.00	\$234.50
1/21/19	MW	Confer with co-counsel DB regarding missing trial exhibits	0.20	\$372.00	\$74.40
	CC		0.20	\$335.00	\$67.00
2/16/19	MW	Review & Edit Plaintiff's Appellant Brief	3.00	\$372.00	\$1,116.00
2/19/19	MW	Strategy meeting with co-counsel RZ & DB regarding appellant brief	1.30	\$372.00	\$483.60
	CC		1.30	\$335.00	\$435.50
2/20/19	MW	Confer with co-counsel DB regarding trial exhibit citation issues	1.00	\$372.00	\$372.00
	CC		1.00	\$335.00	\$335.00

2/28/19	MW	Confer with co-counsel DB regarding brief sufficiency	0.40	\$372.00	\$148.80
2/28/19	CC		0.40	\$335.00	\$134.00
4/25/19	MW	Read, Review & Take Notes for Reply of Defendant's Appellees Brief	3.30	\$372.00	\$1,227.60
5/1/19	MW	Confer with co-counsel DB regarding settlement	0.30	\$372.00	\$111.60
	CC		0.30	\$335.00	\$100.50
5/8/19	CC	Confer with co-counsel regarding settlement and discuss settlement offer	0.50	\$372.00	\$186.00
5/8/19	MW		0.50	\$335.00	\$167.50
5/21/19	MW	Confer with co-counsel regarding settlement and counter offer	0.30	\$372.00	\$111.60
	CC		0.30	\$335.00	\$100.50
6/4/19	MW	Review & Edit Draft of Plaintiff's Appellant Reply Brief	2.40	\$372.00	\$892.80
10/30/19	CC	Listen & Critique Oral Argument Practice with co-counsel Dan Brown,	1.00	\$335.00	\$335.00
	MW	discuss possible questions	1.00	\$372.00	\$372.00
12/12/19	MW	Read & Review Memorandum and Opinion of 5th Circuit Reversing	1.20	\$372.00	\$446.40
		Judgment As A Matter of Law & Remanding Case For Costs			
12/12/19	MW	Confer with co-counsel DB regarding 5th circuit Opinion	0.20	\$372.00	\$74.40
	CC		0.20	\$335.00	\$67.00
12/19/19	CC	Receive & Respond to email from Co-Counsel DB regarding settlement	0.20	\$335.00	\$67.00
		discussions with OC			
12/27/19	MW	Read, Review & Take Note on Appellee's Petition For Re-hearing En	1.40	\$372.00	\$520.80
		Banc			
1/21/20	MW	Read Order Denying Appellees Petition For Re-hearing En Banc	0.20	\$372.00	\$74.40
2/5/20	MW	Confer with Co-Counsel regarding fees and costs	0.30	\$372.00	\$111.60
	CC		0.30	\$335.00	\$100.50
2/20/20	MW	Confer with Dan Brown regarding settlement offer from OC	0.40	\$372.00	\$148.80
2/25/20	CC	Calendar status hearing in front of district judge on 3/5/2020	0.10	\$335.00	\$33.50
3/26/20	CC	Prepare Declaration of Celetha Chatman	1.00	\$335.00	\$335.00
3/26/20	MW	Prepare Declaration of Michael Wood	1.00	\$372.00	\$372.00
3/26/20	MW	Compile time records and expenses.	4.00	\$372.00	\$1,488.00

**Total Attorney Fees****118.80****\$41,389.00**

Filing cost	\$400.00
Service of summons and complaint	\$225.00
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<b>Total Costs</b>	<b>\$625.00</b>
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<b>Total Fees &amp; Costs</b>	<b>\$42,014.00</b>

Zimmer &amp; Associates

Time and Expenses Jean Jones v. PRA et al (16-cv-00572)

<u>Date</u>	<u>Atty</u>	<u>Task</u>	<u>Time</u>	<u>Rate</u>	<u>Total</u>
1/29/17	RZ	Review case file including all pleadings, evidence, motions, etc.	1.50	\$325.00	\$487.50
1/30/17	RZ	Draft / file notice of attorney appearance	0.25	\$325.00	\$81.25
2/18/17	RZ	T/C with co-counsel regarding Plaintiff's MSJ and case strategy	0.30	\$325.00	\$97.50
2/20/17	RZ	Research / draft / file Plaintiff's MSJ	4.00	\$325.00	\$1,300.00
3/13/17	RZ	Read / review Defendant's MSJ	1.00	\$325.00	\$325.00
3/14/17	RZ	Research / draft / file Plaintiff's response opposing D's MSJ	3.00	\$325.00	\$975.00
8/27/17	RZ	Trial prep (case research / file review)	3.00	\$325.00	\$975.00
8/28/17	RZ	T/C with client re: trial strategy	0.50	\$325.00	\$162.50
8/28/17	RZ	T/C with co-counsel re: trial strategy	1.30	\$325.00	\$422.50
8/29/17	RZ	Attend pre-trial conference	1.10	\$325.00	\$357.50
8/29/17	RZ	Attend trial	8.00	\$325.00	\$2,600.00
8/29/17	RZ	Final trial prep; strategy re-adjustments during breaks	1.80	\$325.00	\$585.00
10/13/17	RZ	Further editing of Plaintiff's response to Defendant's Motion for New Trial	0.75	\$325.00	\$243.75
2/16/17	RZ	Review / edit working draft of Jean Jones' appeal brief	2.50	\$325.00	\$812.50
2/19/19	RZ	Review 2nd draft of Jean Jones' appeal brief	0.50	\$325.00	\$162.50
2/19/19	RZ	T/C with co-counsel re: Jean Jones' appeal brief	1.00	\$325.00	\$325.00
2/22/19	RZ	File Jean Jones' appeal brief & record excerpts; T/C with clerk re: paper copies	0.30	\$325.00	\$97.50
4/24/19	RZ	Receipt / review of PRA's brief	0.50	\$325.00	\$162.50
6/4/19	RZ	Review draft of Jean Jones' reply brief	0.50	\$325.00	\$162.50
12/12/19	RZ	T/C with client regarding 5th Cir. ruling in her favor, next steps procedurally	0.30	\$325.00	\$97.50
		total for Attorney Robert Zimmer			
	RZ	<b>Total Attorney Fees</b>	<b>32.10</b>	<b>\$325.00</b>	<b>\$10,432.50</b>



**INVOICE**
 [REDACTED]  
 Date: 03/08/2020  
 [REDACTED]
**Amy Clark Law**
 [REDACTED]  
 [REDACTED]  
 Phone: 5128505290  
 [REDACTED]  
 Email: amy@amyclarklaw.com

Jean Jones

1:16-cv-00572, Western District, Austin Division

**00702-Jones****Jones vs. Portfolio Recovery Associates, et al**

Type	Date	Description	Quantity	Rate	Total
Service	08/22/2017	E-file : e file Notice of Appearance of Counsel (Amy)	0.20	[REDACTED]	[REDACTED]
Service	08/24/2017	Receipt and Review of: mil re: RFA	0.30	\$400.00	\$120.00
Service	08/25/2017	Factual investigation of: requirements for a MIL --what is and is not appropriate for MIL	0.50	\$400.00	\$200.00
Service	08/25/2017	Factual investigation of: reviewing westlaw for MIL cases involving Austin courthouse	0.50	\$400.00	\$200.00
Service	08/28/2017	Travel to and from: home of JJ for trial prep	1.20	\$200.00	[REDACTED]
Service	08/28/2017	Client meeting: trial prep with Jean Jones	2.10	\$400.00	\$840.00
Service	08/28/2017	Review file: docs for exhibits, including oddly numbered and out of order statements	0.90	\$400.00	\$360.00
Service	08/28/2017	Misc. Administration: assembly 4 binders (exhibit list)	0.50	[REDACTED]	[REDACTED]
Service	08/28/2017	Strategize: with RZ re: trial strategy --see paper notes	0.50	\$400.00	\$200.00
Service	08/29/2017	Attend: Pre-trial conference	1.10	\$400.00	\$440.00
Service	08/29/2017	Attend: Trial!	8.00	\$400.00	\$3,200.00
Service	08/29/2017	Trial Prep: final trial prep and re-adjustment [REDACTED]	1.80	\$400.00	\$720.00
Expense	08/29/2017	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Service	10/13/2017	Further editing of: Response to motion for new trial	0.70	\$400.00	\$280.00

Service	10/10/2018	Telephone conference with: assigned mediator and OC	0.60	\$400.00	\$240.00
Service	01/16/2019	Reviewed: transcript for which exhibits got in to evidence and all testimony (and argument) relating to question of consumer debt	0.90	\$400.00	\$360.00
Service	01/16/2019	Draft and Prepare: notes regarding the 2 accounts of Ms. Jones purchased and collected by PRA -- make chart with the disc. docs with this info and the arguments of PRA re: insuf consumer debt evidence	0.30	\$400.00	\$120.00
Service	03/07/2019	Analyze legal position: re: judicial notice of SEC filing and govt report	0.50	\$400.00	\$200.00
Service	03/07/2019	Telephone conference with: SH at 5th re: judicial notice and docs to supplement record	0.20	\$400.00	\$80.00
Service	03/08/2019	Legal research: re: mt supplement and/or mt judicial notice in 5th -- case law and arguments and success rate	1.40	\$400.00	\$560.00
Service	03/11/2019	Draft and Prepare: brief memo summarizing legal research on mt supplement/judicial notice to be used in motion (or to help determine if mt will be filed)	0.80	\$400.00	\$320.00
Service	04/24/2019	Receipt and Review of: PRA's brief	0.50	\$400.00	\$200.00
Service	04/24/2019	Communicate with: OC and co-counsel re: MAC on exhibits;multiple emails and calls	0.20	\$400.00	\$80.00

21.8 hours

Total

\$8,720.00

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
			[REDACTED]	[REDACTED]
			[REDACTED]	[REDACTED]

**Jones v PRA - 5th Circuit Appeal - Daniel Brown Hours**

<b>Date</b>	<b>Description</b>	<b>Hours</b>
11/27/2018	Review district court order granting JMOL and confer with MW re same	0.6
11/28/2018	Confer with MW re JMOL and case history	0.3
1/4/2019	Review JMOL order and research case law cited by court in support of ruling	2.7
1/7/2019	Review notes re appeal strategy (.3); prepare for and confer with working group re appeal strategy, case background questions (.4)	0.7
1/15/2019	Review trial transcript, jury verdict form, hearing transcripts re developing appeal strategy and identifying areas for further research (2.6); prepare for and confer with working group re appeal strategy, fact issues, and questions about the case record (.5)	3.1
1/18/2019	Troubleshoot trial exhibits not included in public record and confer with working group re same (.4); draft arguments re witness credibility and jury determinations (3.2); review 5th circuit rules to ensure compliance in opening brief (.4)	4
1/21/2019	Review issues with missing record documents and follow up re same (.3); prepare for and confer with working group re missing trial exhibits and request for deadline extension re same (.2)	0.5
1/23/2019	Follow up on new briefing deadline and missing trial exhibits	0.3
2/11/2019	Review trial transcript and case record for key facts and citations for support of primary arguments re sufficiency of evidence (2.4); draft opening appeal brief statement of the case with citations to trial transcript and trial exhibits (5.5); review, revise same (.8)	8.8
2/12/2019	Draft opening appeal brief arguments re witness credibility and inferences (3.5); research case law re same (2.6); review, revise draft and insert additional citations (.7)	6.8
2/13/2019	Research re issues about supplementing record (.3); review case law re same (.5); analyze strategic issues re same (.4); outline brief arguments (1.9); connect statement of the case to argument outline to ensure clarity and consistency in fact descriptions and legal arguments (2.8); research case law support for argument points and insert same into outline (1.4)	7.3
2/14/2019	Draft argument re purpose of FDCPA and importance of consumer protection (.9); draft standard of review (.4); draft argument re sufficiency of testimony and documentary evidence (2.4); case law research re same (.8); draft arguments re common knowledge and record supplements re same (1.3); research re private label credit cards and widespread use of same (.8); review CFPB report and include same in common knowledge arguments (.6); draft argument re court interpretation of Browne case (1.4); draft argument re PRA counsel statements at trial (1.1) review and edit entire brief and ensure all sections completed, for clarity, and for overall themes and persuasiveness (2.6)	12.3

2/15/2019	Review, edit entire brief (1.0); check record citations re same (.6); additional case law research re same (.6); edit common knowledge arguments and judicial notice issues (.5); edit statement of the case to ensure fluidity with arguments (1.3); review and edit entire brief after making additional changes (.9) ; draft email to working group re same seeking comment (.3)	5.2
2/16/2019	Follow up research re verdict form and waiver arguments re same per MW comments; research issues re OC opening statement and admissions therein; confer with working group re next steps	1.5
2/17/2019	Prepare for and confer with RZ re argument strategy and changes to the brief re same	0.6
2/18/2019	Revise brief per working group comments and suggestions as well as to clarify arguments and clean up grammar/phrasing	1.3
2/19/2019	Revise brief per working group comments (.8); analyze record excerpts re same (.5); case law research re same (.6); prepare for and confer with working group re revised brief and related strategy issues (.5); further revise brief to have complete, file-ready draft subject to further review and comment (1.0); NOT INCLUDED IN BILLED TIME: draft and format table of contents (.6); draft and format table of authorities (2.0)	3.4
2/20/2019	Confer with working group re trial exhibit citation issues and troubleshoot same (.4); revise statement of the case for further clarity (.7)	1.1
2/21/2019	Review, edit brief per working group comments (.8); edit statement of the case to ensure not overly argumentative (.5); review common knowledge arguments and analyze strategy issues re same (.7)	2
2/22/2019	Make additional edits to statement of the case to avoid argumentative tone (.6); review and edit entire brief to ensure finalized and correct lingering typos or citation issues (1.4); confer with working group re final draft of brief (.2); NOT INCLUDED IN BILLED TIME: Prepare and file 5th Circuit Appearance Form (.3)	2.2
2/25/2019	Review order re issues with brief and follow up re same	0.4
2/28/2019	Prepare for and confer with working group re next steps for addressing order re brief sufficiency (.2); draft email to clerk's office re same seeking clarity (.3)	0.5
3/5/2019	Follow up re proposed sufficient brief and issues re exhibits	0.2
3/6/2019	Follow up re proposed sufficient brief and issues re exhibits	0.2
3/11/2019	Revise brief to address exhibit issues and order re brief sufficiency	0.5
4/24/2019	Analyze strategy issues re OC's email re motion to strike	0.3
4/29/2019	Email with OC re potential settlement (.2); update working group re same (.1); call with OC re potential settlement and update working group re same (.4); address issues re conflicts and ensure settlement discussions among parties do not have conflicts of interest in representation (.5)	1.2
4/30/2019	Email with OC re settlement issues	0.3
5/1/2019	Confer with working group re settlement issues	0.3

5/8/2019	Confer with workingr group re settlement issues and present settlement offer to OC	0.5
5/13/2019	Confer with conflicts counsel re Jones settlement position (.2); draft motion to extend reply deadline and confer with OC re same (.3)	0.5
5/14/2019	Finalize motion to extend reply deadline (.2); NOT INCLUDED IN BILLED TIME: file motion to extend (.2)	0.2
5/15/2019	Review latest PRA settlement proposal and confer with working group re same	0.3
5/21/2019	Confer with working group re counter-proposale and email with OC re same (.3); confer with Jones conflicts counsel re Jones settlement position update (.2)	0.5
5/24/2019	Call with OC re settlement position and updates involving non-Jones parties (.3); update working group re same and analyze settlement strategy issues in light of new updates (.4); FUTURE SETTLEMENT TALKS BILLED TO OTHER MATTERS BECAUSE JONES SETTLEMENT UNLIKELY TO BE INCLUDED	0.7
5/28/2019	Confer with Jones conflicts counsel re Jones settlement position	0.4
6/1/2019	Review appellees' brief and outline responses to same	2.2
6/3/2019	Draft more fulsome outline of reply arguments (1.5); conduct fact research and legal research re same (1.6)	3.1
6/4/2019	Draft reply brief arguments re PRA attempts at misdirection and re-focusing on key facts in record (3.3); conduct additional fact and legal research re same (1.1); draft arguments re trial counsel misstatements and meaning of same for jury review (1.8); draft arguments re common knowledge and public information re jury inferences (1.8); draft reply argument re Browne case (1.5) review and revise entire brief for clarity, consistency, themes, and persuasiveness (2.0)	11.5
6/5/2019	Revise reply brief per working group comments (2.2); final review and edits, with additional legal research for further support of deference to jury (4.6); ADDITIONAL TIME NOT INCLUDED IN BILLED TIME: draft and formate table of contents (.3); draft and formate table of authorities (1.5)	6.8
10/28/2019	Submit oral argument confirmation	0.2
10/30/2019	Prepare oral argument talking points (1.1); draft introductory remarks (.5); rehearse oral argument introduction (.3); rehearse "cold bench" oral argument presentation (.4); brainstorm potential questions from panel and plot out responses to same (.5); additional case law research re same (.2)	3
10/31/2019	Confer with working group re oral argument cancellation	0.1
12/12/2019	Review 5th Circuit opinion reversing and remanding the case and confer with working group re same	0.6
12/27/2019	Review PRA's petition for re-hearing en banc and analyze issues re same	0.4
1/21/2020	Review court order denying petition for re-hearing	0.1

2/5/2020	Confer with working group re fees and expenses and prepare settlement offer to PRA re fees	0.3
2/20/2020	Review PRA proposal to resolve outstanding issues and confer with working group re same	0.3
2/21/2020	Email OC re rejection and related issues with PRA proposal	0.1
3/2/2020	Call with OC re settlement issues and PRA's position and confer with working group re same	0.6
3/3/2020	Email to OC re response to settlement position by PRA	0.5
3/24/2020	Review time records and edit entries for typos and clarity; remove time entries that do not include properly billable work; draft declaration in support of reasonableness of accrued fees and expenses	1
3/25/2020	Review, revise declaration in support of fees	0.2
4/1/2020	Research re fee objections by PRA in Tejero and Ozmun cases for reference (.4); legal research re same and re reasonableness issues for cases with different attorneys handling different types of work (1.3); review, revise fee application re same (2.0)	3.7
4/2/2020	Review, revise fee application arguments re reasonableness of the hours billed and efficiency (.5); revise arguments re Johnson factors (.3)	0.8
	TOTAL HOURS	107.20
	HOURLY RATE	425.00
	TOTAL FEES	45,560.00

**Jones v PRA - 5th Circuit Appeal - Daniel Brown Expenses**

Flight (includes reschedule after oral arg cancelled)	735.45
Hotel (1/2 of hotel expense, other 1/2 billed to Tejero)	116.04
TOTAL EXPENSES	851.49